

UNITED STATES DISTRICT COURT  
DISTRICT OF SOUTH CAROLINA  
GREENWOOD DIVISION

FLEXIBLE TECHNOLOGIES, INC.,

Plaintiff,

vs.

SHARKNINJA OPERATING, LLC,  
SHARKNINJA MANAGEMENT  
COMPANY, and SHARKNINJA SALES  
COMPANY,

Defendants.

C. A. NO.: \_\_\_\_\_

**FLEXIBLE TECHNOLOGIES, INC.'S  
ANSWERS TO LOCAL CIVIL RULE  
26.01 INTERROGATORIES**

(JURY TRIAL DEMANDED)

Plaintiff, Flexible Technologies, Inc. ("Plaintiff" or "FTI") provides the following information pursuant to Local Civil Rule 26.01:

**(A) State the full name, address and telephone number of all persons or legal entities who may have a subrogation interest in each claim and state the basis and extent of that interest.**

RESPONSE: There are none known to FTI at this time.

**(B) As to each claim, state whether it should be tried jury or nonjury and why.**

RESPONSE: FTI has demanded a jury trial.

**(C) State whether the party submitting these responses is a publicly-owned company and separately identify: (1) any parent corporation and any publicly-held corporation owning ten percent (10%) or more of the party's stock; (2) each publicly-owned company of which it is a parent; and (3) each publicly-owned company in which the party owns ten percent (10%) or more of the outstanding shares.**

RESPONSE: FTI is not a public company. (1) FTI is a wholly owned subsidiary of Smiths Group International Holdings, Ltd., which is a wholly owned subsidiary of Smiths Group plc, which is listed on the London Stock Exchange. (2) None. (3) None.

**(D) State the basis for asserting the claim in the division in which it was filed (or the basis of any challenge to the appropriateness of the division).**

RESPONSE: FTI is domiciled and does business in this division.

**(E) Is this action related in whole or in part to any other matter filed in this District, whether civil or criminal? If so, provide: (1) a short caption and the full case number of the related action; (2) an explanation of how the matters are related; (3) a statement of the status of the related action. Counsel should disclose any cases which *may be* related regardless of whether they are still pending. Whether cases *are* related such that they should be assigned to a single judge will be determined by the Clerk of Court based on a determination of whether the cases: arise from the same or identical transactions, happenings or events; involve the identical parties or property; or for any other reason would entail substantial duplication of labor if heard by different judges.**

RESPONSE: FTI is not aware of the relationship of this matter to any other matter currently filed in this District.

Respectfully submitted,

s/Christopher B. Schoen  
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(*pro hac vice applications to be filed*)

Attorneys for FLEXIBLE TECHNOLOGIES, INC.

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